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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LEON ROBERT HARDY,

Plaintiff,

v.

TRUE CONNECTIONS LLC, a Ohio
Domestic Limited Liability Company; ML-
CFC 2007-7 EAST FLAMINGO ROAD,
LLC, a Foreign Limited-Liability Company;
ARCHER WEST SECURITY &
CONSULTING GROUP LLC, Domestic
Limited Liability Company; ROE
PROPERTY MANAGEMENT
COMPANY; DOES I through X; and ROE
CORPORATIONS III through X, inclusive,

Defendants.

CASE NO. 2:24-cv-01824-BNW

**STIPULATION AND ORDER TO
AMEND SCHEDULING ORDER
(SECOND REQUEST)**

Pursuant to LR IA 6-1, the parties, by and through their respective counsel of record,
hereby

1 stipulate to request that this Court enter an order extending the deadlines in the current
2 Scheduling Order [Doc 12].

3 The parties bring this stipulation and request for an order extending pretrial deadlines to
4 allow the parties to complete additional discovery necessary for expert discovery, fact discovery
5 and trial preparation. This is the parties second request for an extension of deadlines. There is
6 no trial date set in this matter.

7 Good cause exists to extend the pretrial deadlines. The parties have worked diligently to
8 complete discovery.

9 **DISCOVERY COMPLETED TO DATE- LR 26-3(a)**

- 10 1. The parties participated in the Fed. R. Civ. P. 26(f) conference.
- 11 2. Plaintiff produced his initial Fed. R. Civ. P. 26(a) disclosures.
- 12 3. Defendant ML-CFC 2007-7 EAST FLAMINGO ROAD, LLC produced their
13 initial Fed. R. Civ. P. 26(a) disclosures.
- 14 4. Plaintiff served their First Set of Interrogatories, and Requests for Production to
15 Defendant ML-CFC 2007-7 EAST FLAMINGO ROAD, LLC on January 14,
16 2025.
- 17 5. Defendant ML-CFC 2007-7 EAST FLAMINGO ROAD, LLC served their First
18 Set of Interrogatories and Requests for Production to Plaintiff on January 21,
19 2025;
- 20 6. Plaintiff responded to Defendant ML-CFC 2007-7 EAST FLAMINGO ROAD,
21 LLC' Discovery on February 14, 2025;
- 22 7. Defendant, ML-CFC 2007-7 EAST FLAMINGO ROAD, responded to Plaintiff's
23 Discovery Requests on March 18, 2025,

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25 **DISCOVERY REMAINING – LR 26-3(b)**

- 26 1. complete production of records from third parties;
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2. disclosure of initial and rebuttal expert witnesses;
3. depositions of parties and percipient witnesses;
4. depositions of expert witnesses; and
5. any additional discovery that the parties may deem necessary.

GOOD CAUSE FOR EXTENSION – LR 26-3(c)

Pursuant to LR IA 6-1 and LR 26-3, the parties represent that good cause exists for the extension of the deadline for discovery deadlines, and the deadlines for dispositive motions and the joint pre-trial order. Plaintiff filed a Second Amended Complaint on April 11, 2025 to add new Defendant, ARCHER WEST SECURITY & CONSULTING GROUP LLC. Defendant, ARCHER WEST SECURITY & CONSULTING GROUP LLC was served with the Second Amended Complaint on May 14, 2025. The parties are still waiting for the new Defendant to respond to the Second Amended Complaint. As such, the parties need to extend all discovery deadlines to allow the new Defendant to participate in said discovery.

Accordingly, the parties request extending the remaining deadlines by 90 days, as outlined below:

PROPOSED DISCOVERY DEADLINES - LR 26-3(d)

	CURRENT DEADLINE	NEW DEADLINE
Initial Experts	June 24, 2025	September 22, 2025
Rebuttal Experts	July 24, 2025	October 22, 2025
Discovery Deadline	August 25, 2025	November 24, 2025
Dispositive Motions	September 24, 2025	December 24, 2025
Pre-Trial Order	October 24, 24, 2025	January 23, 2026

1 If this extension is granted, all remaining discovery mentioned above should be concluded
2 within the stipulated extended deadline.

3 The parties agree that this request for extension of discovery deadlines is made by the parties
4 in good faith and not for the purpose of delay.

5 **STIPULATED TO BY:**

6 DATED this 27th day of May 2025.

DATED this 27th day of May 2025.

7
8 MOSS BERG INJURY LAWYERS

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

9 /s/ Marcus A. Berg

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20 **IT IS SO ORDERED.**

21 
22 **UNITED STATES MAGISTRATE JUDGE**

23 **DATED:** May 27, 2025
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